

Andrew M. Jacobs
Nevada Bar No. 12787
Kelly H. Dove
Nevada Bar No. 10569
Wayne Klomp
Nevada Bar No. 10109
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
Email: ajacobs@swlaw.com
kdove@swlaw.com
wkomp@swlaw.com
Attorneys for Wells Fargo Bank, N.A.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BOURNE VALLEY COURT TRUST,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.; MTC
FINANCIAL INC., d/b/a TRUSTEE CORPS;
and NEVADA LEGAL NEWS, LLC,

Defendants.

Case No. 2:13-cv-00649-JCM-GWF

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE ON
MOTION TO DISMISS (ECF NO. 90)**

(Second Request)

AND ALL RELATED CASES

Pursuant to Local Rules IA 6-1 and 7-1, Wells Fargo Bank, N.A. (“Wells Fargo”), Federal Home Loan Mortgage Corporation (“Freddie Mac”), Bourne Valley Court Trust (“Bourne Valley”), and The Parks Homeowners Association (“HOA” and together with Wells Fargo, Freddie Mac, and Bourne Valley the “Parties”), through their counsel of record, stipulate as follows:

On September 8, 2017, the HOA filed a Motion to Dismiss Counterclaim (“Motion”) (ECF No. 90). A response to the Motion would have been due September 22, 2017 under the

1 Rules, and the HOA's reply would have been due September 29, 2017. Under the first extension,
2 a response to the Motion was due October 9, 2017, and the HOA's reply would have been due
3 October 16, 2017. For the convenience of the Parties and in order to address the rapidly evolving
4 law, the Parties stipulate and agree to extend the briefing schedule and the timing for responses
5 and replies to the Motion. In addition, the parties are engaging in discussions in an attempt to
6 resolve aspects of this matter, which could narrow further briefing or render it unnecessary.

7 ///

9 ///

11 ///

13 ///

15 ///

17 ///

19 ///

21 ///

23 ///

25 ///

27 ///

The Parties agree that any response to the Motion will be due **October 23, 2017**, with any reply due **October 30, 2017**. The Parties stipulate and agree to the foregoing in good faith. This Stipulation is made for the benefit and convenience of the Parties and is not intended to delay the proceedings in this case.

DATED this 6th day of October, 2017.

KIM GILBERT EBRON

By: /s/ Diana S. Ebron

Diana S. Ebron, Esq.
Nevada Bar No. 10580
Jacqueline A. Gilbert, Esq.
Nevada Bar No. 10593
Karen L. Hanks, Esq.
Nevada Bar No. 9578
7625 Dean Martin Drive, Suite 110
Las Vegas, NV 89139

Attorneys for Bourne Valley Court Trust

DATED this 6th day of October, 2017.

GORDON REES SCULLY MANSUKHANI

By: /s/ David T. Gluth

Robert S. Larson, Esq.
Nevada Bar No. 7785
David T. Gluth, Esq.
Nevada Bar No. 10596
300 South Fourth Street, Suite 1550
Las Vegas, NV 89101

Attorneys for The Parks Homeowners Assoc.

DATED this 6th day of October, 2017.

SNELL & WILMER L.L.P.

By: /s/ Kelly H. Dove

Andrew M. Jacobs, Esq.
Nevada Bar No. 12787
Kelly H. Dove, Esq.
Nevada Bar No. 10569
Wayne Klomp, Esq.
Nevada Bar No. 10109
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169

Attorneys for Wells Fargo Bank, N.A.

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: October 6, 2017

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing document by the method indicated below:

<u> X </u>	Electronic Service (CM/ECF)	<u> </u>	Federal Express
<u> </u>	U.S. Mail	<u> </u>	U.S. Certified Mail
<u> </u>	Facsimile Transmission	<u> </u>	Hand Delivery
<u> </u>	Email Transmission	<u> </u>	Overnight Mail

and addressed to the following:

Diana Cline Ebron, Esq.
Jacqueline A. Gilbert, Esq.
Karen L. Hanks, Esq.
KIM GILBERT EBRON
7625 Dean Martin Dr., Ste. 110
Las Vegas, NV 89139-5974
Telephone: (702) 485-3300
Fax: (702) 485-3301

Robert S. Larson, Esq.
David T. Gluth, Esq.
GORDON REES SCULLY MANSUKHANI, LLP
300 South Fourth Street, Suite 1550
Las Vegas, NV 89101
Telephone: (702) 577-9300
Facsimile: (702) 255-2858

Attorneys for The Parks Homeowners Association

Attorneys for Bourne Valley Court Trust

DATED this 6th day of October, 2017.

/s/ Ruby Lengsavath
An Employee of Snell & Wilmer L.L.P.

4852-8087-5857